



Squire Patton Boggs (US) LLP  
2550 M Street, NW  
Washington, DC 20037

O +1 202 457 6000  
F +1 202 457 6315  
squirepattonboggs.com

Paul C. Besozzi  
Peter M. Bean  
paul.besozzi@squirepb.com  
peter.bean@squirepb.com

September 25, 2018

**VIA ECFS AND HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Applications of Securus Technologies, Inc. and Inmate Calling Solutions, LLC d/b/a ICSolutions for Consent to the Transfer of Control of Licenses and Authorizations – WC Docket No. 18-193**

Dear Ms. Dortch:

Securus Technologies, Inc. (“STI”) hereby provides its initial responses to the September 11, 2018 Information and Document Requests from the Federal Communications Commission (“FCC” or “Commission”) in the above-referenced docket.<sup>1</sup>

Enclosed please find:

1. STI’s initial narrative responses to the Information Requests;
2. Two hard drives containing the load files associated with the document production comprising the custodial documents provided to the Department of Justice (“DOJ”) to date under the Second Request pursuant to the Hart-

---

<sup>1</sup> Letter from Lisa Hone, Deputy Chief, WCB, to Paul C. Besozzi and Peter M. Bean, Squire Patton Boggs (US) LLP, Counsel for Securus Technologies, Inc. and Howard M. Liberman and Jennifer L. Kostyu, Wilkinson Barker Knauer, LLP, Counsel for TKC Holdings, Inc. and Inmate Calling Solutions, LLC d/b/a ICSolutions, WC Docket No. 18-193, DA 18-939 (dated Sept. 11, 2018) (“Information Requests”).

Ms. Marlene H. Dortch  
September 25, 2018  
Page 2

Scott-Rodino Antitrust Improvements Act of 1976 (the “Document Production”) and;

3. One flash drive containing a separate document production comprising certain documents specifically sought by the Commission in the Information Requests (the “Supplemental Production”).

The hard drives have been labeled “HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 18-193 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION” in accordance with paragraph 5 of the Protective Order<sup>2</sup> in the above-referenced docket.<sup>3</sup>

The flash drive documents in the Supplemental Production have been Bates labeled in accordance with the instructions in the Information Requests<sup>4</sup> and stamped, with one exception, as “HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 18-193 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION” in accordance with the Protective Order.

This filing contains information that is Highly Confidential under the Protective Order in WC Docket No. 18-193. In accordance with paragraph 3 of the Protective Order, Securus has received the written approval of the Commission staff to designate certain information provided herewith as Highly Confidential.<sup>5</sup> Pursuant to the procedures set forth in the Information Requests and the Protective Order, a copy of the Highly Confidential filing, including the hard drives and flash drive, is being provided to the Secretary’s Office. In addition, two copies of the Highly Confidential filing, including the

---

<sup>2</sup> *In the Matter of TKC Holdings, Inc., Transferor, Inmate Calling Solutions, LLC d/b/a ICSolutions, Licensee, and Securus Technologies, Inc., Transferee, Consolidated Applications for Consent to Transfer Control of Domestic and International Authorizations Pursuant to Section 214 of the Communications Act of 1934, as Amended*, Protective Order, WC Docket No. 18-193, DA 18-938, ¶5 (rel. Sept. 11, 2018) (“Protective Order”).

<sup>3</sup> Pursuant to discussions with the Commission’s Staff, all custodial documents and data provided in the Document Production have been classified as “Highly Confidential Information” under the Protective Order. Notwithstanding that default classification, Securus is not asserting Highly Confidential status for any documents that have been publicly released (which would be public) or for third-party materials that are copyrighted (which would be considered confidential). The Commission Staff has also agreed to accept the Bates numbers and confidentiality markings on all of the documents in the Document Production, which differ from the requirements under the Protective Order.

<sup>4</sup> Information Requests at 10, instruction 3.

<sup>5</sup> Protective Order ¶ 3.

Ms. Marlene H. Dortch  
September 25, 2018  
Page 3

hard drives and flash drive, are being provided to Jodie May and Michael Ray of the Commission's Staff. Separately, a redacted copy of this filing labeled "REDACTED – FOR PUBLIC INSPECTION" is being filed electronically through the Commission's Electronic Comment Filing System in the above-referenced docket.<sup>6</sup>

STI has made a diligent effort to ensure that none of the documents being produced herewith is privileged under the attorney-client privilege or the attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. STI requests that any privileged documents inadvertently produced be returned to STI as soon as the inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

In support of this request for treatment of the enclosed information as Highly Confidential Information, Securus provides the following information:<sup>7</sup>

**(1) Identification of the specific information for which confidential treatment is sought**

Securus hereby seeks Highly Confidential treatment of the information provided on the enclosed hard drives and flash drive with the caveats noted above. This information is properly designated as Highly Confidential Information under Appendix A of the Protective Order.<sup>8</sup>

**(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission**

The information is provided in connection with the Information Requests issued by the Wireline Competition Bureau in WC Docket No. 18-193.

**(3) Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged**

The subject information fits into one or more of the categories listed in Appendix A of the Protective Order as explained to the Commission Staff. Additionally, the information provided constitutes proprietary commercial and business information or

---

<sup>6</sup> Additionally and except for the materials filed pursuant to the Protective Order, Securus is providing a copy of materials filed in response to the Information Requests to Dennis Johnson, Michael Ray, and Douglas Galbi by email. *See* Information Requests at 2.

<sup>7</sup> 47 C.F.R. § 0.459(b).

<sup>8</sup> Protective Order Appendix A.

Ms. Marlene H. Dortch  
September 25, 2018  
Page 4

confidential materials not routinely available for public inspection under Exemption 4 of the FOIA.<sup>9</sup> Securus hereby requests that such information be treated as Highly Confidential Information under the Protective Order and not be made routinely available for public inspection.

**(4) Explanation of the degree to which the information concerns a service that is subject to competition**

The Highly Confidential Information pertains to STI's provision of inmate telephone calling and related services ("ITS"), a nationwide competitive service.

**(5) Explanation of how disclosure could result in substantial competitive harm**

Disclosure of the Highly Confidential Information to the public or to competitors of STI would "allow those persons to gain a significant advantage in the marketplace or negotiations."<sup>10</sup> The presence of competitors in the ITS market and the likelihood of competitive injury to STI threatened by release of this information should compel the Commission to withhold the information designated as Highly Confidential Information from public disclosure. The Commission has provided assurances that it is "sensitive to ensuring that the fulfillment of its regulatory responsibilities does not result in the unnecessary disclosure of information that might put its regulatees at a competitive disadvantage."<sup>11</sup>

**(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure**

In order to prevent unauthorized disclosure of the subject information, STI is hereby submitting a request that the subject information be treated as Highly Confidential Information indefinitely, and STI has obtained Commission staff's written approval to designate the subject information as Highly Confidential Information pursuant to paragraph 3 of the Protective Order.<sup>12</sup> STI takes routine measures to ensure the confidentiality of this information during normal business operations, including instructing its employees and contracting partners not to disclose such information outside of STI, and restricting access to this information internally.

---

<sup>9</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457.

<sup>10</sup> Protective Order ¶ 2.

<sup>11</sup> *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, Report and Order, 13 FCC Rcd 24816, ¶ 8 (1998).

<sup>12</sup> Protective Order ¶ 3.

Ms. Marlene H. Dortch  
September 25, 2018  
Page 5

**(7) Identification of whether information is available to the public and the extent of any previous disclosure of the information to third parties**

The subject information is not ordinarily available to the public or to any third parties.

**(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure**

As described above, the subject information contains highly sensitive information within one or more of the categories set forth in Appendix A of the Protective Order and constitutes proprietary commercial and business information or confidential materials not routinely available for public inspection under Exemption 4 of the FOIA.<sup>13</sup> Disclosure of this information would cause significant competitive injury to Securus if disclosed. For this reason, STI respectfully requests that the Commission protect this information from public disclosure indefinitely.

**(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted**

As the subject information is being submitted voluntarily, STI requests that, in the event that the Commission denies STI's request for confidentiality, the Commission return the materials without consideration of the contents therein.

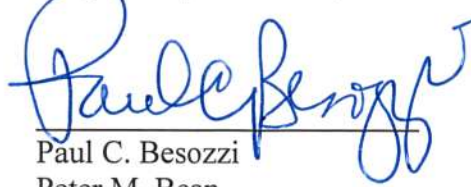
Please contact the undersigned should you have any questions concerning the foregoing.

---

<sup>13</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457.

Ms. Marlene H. Dortch  
September 25, 2018  
Page 6

Respectfully submitted,



Paul C. Besozzi

Peter M. Bean

Squire Patton Boggs (US) LLP

2550 M Street, NW

Washington, DC 20037

202-457-6000 (tel)

202-457-6315 (fax)

paul.besozzi@squirepb.com

peter.bean@squirepb.com

*Counsel for Securus Technologies,  
Inc.*

cc: Jodie May  
Michael Ray

**REDACTED – FOR PUBLIC INSPECTION**

**Documents Responsive to the Information Requests**

Documents responsive to the Information Requests have been provided on the enclosed hard drives and a flash drive.

**[REDACTED]**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of the Joint Application of	)	
	)	
<b>TKC Holdings, Inc.</b> , Transferor	)	
	)	
<b>Inmate Calling Solutions, LLC d/b/a</b>	)	
<b>ICSolutions</b> , Licensee	)	
	)	WC Docket 18-193
and	)	
	)	ITC-T/C-20180612-00109
<b>Securus Technologies, Inc.</b> , Transferee	)	
	)	
For Grant of Authority Pursuant to Section 214	)	
of the Communications Act of 1934, as	)	
amended, and Sections 63.04 and 63.24 of the	)	
Commission's Rules to Transfer Ownership and	)	
Control of Inmate Calling Solutions, LLC d/b/a	)	
ICSolutions to Securus Technologies, Inc.	)	
	)	

**INITIAL RESPONSES TO INFORMATION AND DOCUMENT REQUESTS BY  
SECURUS TECHNOLOGIES, INC.**

Securus Technologies, Inc. ("STI") hereby provides the below initial responses and explanations to the Federal Communications Commission's ("FCC" or "Commission") Information and Document Requests dated September 11, 2018.<sup>1</sup> As noted in the accompanying cover letter, STI is providing two sets of responsive documents and data in electronic form delivered to the Commission: (1) a document production comprising the custodial documents provided to the Department of Justice ("DOJ") to date under the Second Request pursuant to the Hart-Scott-Rodino Antitrust Improvements Act of 1976 (the "Document Production")<sup>2</sup> and (2) a

---

<sup>1</sup> Letter from Lisa Hone, Deputy Chief, Wireline Competition Bureau, FCC, to Paul C. Besozzi and Peter M. Bean, Squire Patton Boggs (US) LLP, Counsel for Securus Technologies, Inc. and Howard M. Liberman and Jennifer L. Kostyu, Wilkinson Barker Knauer, LLP, Counsel for TKC Holdings, Inc. and Inmate Calling Solutions, LLC, WC Docket No. 18-193, DA 18-939 (Sept. 11, 2018) ("Information Requests").

<sup>2</sup> As noted in the cover letter and pursuant to discussions with the Commission's Staff, all custodial documents and data provided in the Document Production have been classified as "Highly



separate production comprising certain documents specifically sought by the Commission (the “Supplemental Production”). STI has reviewed the relevant parts of the Information Requests asking for “all documents” or similar language and believes that the documents responsive to those specifications are within the Document Production. Pursuant to discussions with Commission Staff, STI has referenced the Document Production. For other specifications asking STI to identify specific documents, STI provides a Bates range for those targeted requests that are included in the Supplemental Production.

As STI has explained to the Commission Staff, the Document Production is still ongoing. As such, STI is providing in this Initial Response the entire portion of the Document Production that has been submitted to the DOJ to date. It is currently anticipated that the balance of the response to the DOJ’s Second Request will be completed on or about October 1, 2018. Accordingly, STI will be providing the balance of the Document Production as it becomes available.<sup>3</sup>

This filing contains an initial specification-by-specification response to the Information Requests, referencing the Document Production or the Supplemental Production as appropriate. As explained to Commission Staff, in certain circumstances noted below, certain narrative responses are being prepared in conjunction with substantially identical requests in the DOJ’s Second Request. In order to ensure consistency between those responses for which there is an overlap between the Second Request and the Information Requests, STI will provide the narrative responses submitted to the DOJ and cross-reference those responses. Because those responses

---

Confidential Information.” Notwithstanding that default classification, STI is not asserting Highly Confidential status for any documents that have been publicly released (which would be public) or for third-party materials that are copyrighted (which would be considered Confidential).

<sup>3</sup> The privilege log prepared in connection with the Document Production will be provided to the Commission concurrent with delivery to DOJ.

have not yet been submitted to the DOJ, STI will update these initial responses following submission of the narrative responses to the DOJ where required.

1. ***Submit one copy of organization charts and personnel directories for each of the past two years for each Applicant as a whole and for each of the Applicants' facilities or divisions involved in any activity relating to any Relevant Service, including:***

**Response to Specification 1:** Copies of organization charts and personnel directories for each of the past two years have been provided in the DOJ Production at Bates range SCI00000001 – SCI00000329.

- a. ***a list of persons responsible for establishing policies, practices, and procedures, for pricing, commissions, sales/marketing, discounting, introduction of new products/features, research and development, and a brief description of role and responsibility; and***

**Response to Specification 1(a):**

STI<sup>4</sup>

Category	2015	2016	2017	2018
Pricing	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Commissions	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Sales	Conklin	Bell	Bell	Roberts
Marketing	Roberts	Roberts	Roberts	Roberts
New Products	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Smith	Smith	Smith	Smith
Research and Development	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Smith	Smith	Smith	Smith
Manufacturing and Output <sup>5</sup>	De Hoyos	De Hoyos	De Hoyos	De Hoyos

---

<sup>4</sup> Except as indicated for Public Safety, Payment Systems, Monitoring, and Wireless Containment, relevant polices, practices, and procedures for all other Relevant Services are set by STI.

<sup>5</sup> Equipment is ordered based on the requirements of specific contracts. As part of negotiating a contract with a facility customer, STI will conduct a site survey and prepare a bill of materials. After the contract is signed, the project implementation team will order the required equipment.

Archonix Systems, LLC (Public Safety)

<b>Category</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Pricing	Singhvi	Singhvi	Kester	Kester
	Conklin	Bell	Bell	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Commissions	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Sales	Conklin	Bell	Bell	Roberts
Marketing	Roberts	Roberts	Roberts	Roberts
New Products	Singhvi	Singhvi	Kester	Kester
Research and Development	Singhvi	Singhvi	Kester	Kester
Manufacturing and Output <sup>6</sup>	N/A	N/A	N/A	N/A

JPay, Inc. (Payment Services and Tablets)

<b>Category</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Pricing	Shapiro	Shapiro	Feldman	N/A
	Levine	Levine	Levine	Levine
	Chambers-Smith	Chambers-Smith	Chambers-Smith	Chambers-Smith
	Silverman	Silverman	N/A	N/A
	Katz	Katz	Katz	Katz
Commissions	Shapiro	Shapiro	Feldman	N/A
	Levine	Levine	Levine	Levine
	Chambers-Smith	Chambers-Smith	Chambers-Smith	Chambers-Smith
	Silverman	Silverman	N/A	N/A
	Katz	Katz	Katz	Katz
Sales	Levine	Levine	Levine	Levine
Marketing	Trombetta	Trombetta	Trombetta	Trombetta
New Products	Shapiro	Shapiro	Feldman	N/A
	Katz	Katz	Katz	Katz
Research and Development	Shapiro	Shapiro	Feldman	Pickens
				Roberts
				Smith
				Katz
Manufacturing and Output	Shapiro	Shapiro	Feldman	N/A

<sup>6</sup> Archonix produces software products, and any necessary equipment is purchased as part of the requirements of specific contracts.

	Chambers-Smith	Chambers-Smith	Chambers-Smith	Chambers-Smith
--	----------------	----------------	----------------	----------------

#### Satellite Tracking of People LLC (“STOP”) (Monitoring)

Category	2015	2016	2017	2018
Pricing	Secrest	Secrest	Secrest	Secrest
	Utterback	Utterback	Utterback	Utterback
Commissions	Secrest	Secrest	Secrest	Secrest
	Utterback	Utterback	Utterback	Utterback
Sales and Marketing	Secrest	Secrest	Secrest	Secrest
	Utterback	Utterback	Utterback	Utterback
New Products	Secrest	Secrest	Secrest	Secrest
	Utterback	Utterback	Utterback	Utterback
Research and Development	Freathy	Freathy	Freathy	Freathy
Manufacturing and Output	Secrest	Secrest	Secrest	Secrest
	Freathy	Freathy	Freathy	Freathy

#### Wireless Containment Services

Category	2015	2016	2017	2018
Pricing	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Commissions	Pickens	Pickens	Pickens	Pickens
	Roberts	Roberts	Roberts	Roberts
	Hershberger	Hershberger	Hershberger	Hershberger
Sales	Conklin	Bell	Bell	Roberts
Marketing	Roberts	Roberts	Roberts	Roberts
New Products	Wigger	Wigger	Wigger	Wigger
Research and Development	Wigger	Wigger	Wigger	Wigger
Manufacturing and Output <sup>7</sup>	Wigger	Wigger	Wigger	Wigger

#### Responsible Persons

**John Bell**, STI Senior Vice President, Sales, 2016-2017, during which he directed STI’s sales efforts.

**Annette Chambers-Smith**, JPay Chief Operating Officer.

---

<sup>7</sup> Equipment is ordered based on the requirements of specific contracts. As part of negotiating a contract with a facility customer, STI will conduct a site survey and prepare a bill of materials. After the contract is signed, the project implementation team will order the required equipment.

**Joshua Conklin**, STI Vice President, Sales until 2016, during which he directed STI's sales efforts; Vice President, Strategic Initiatives until 2017, during which he was focused on sales to departments of correction; and Vice President, Business Development, Payment Services, in which he directs the sales efforts for STI's Payment Services division.

**Danny de Hoyos**, STI Senior Vice President, Operations. Mr. de Hoyos is responsible for all aspects of delivery of STI products and services, including installation and implementation, customer service, technical support, field operations, as well as operations for STI's Public Safety and EMS divisions.

**Errol Feldman**, JPay Chief Executive Officer from September 17, 2016 to January 2, 2018.

**Stephen Freathy**, STOP Vice President, Engineering and Manufacturing. Mr. Freathy is responsible for product engineering and product assembly for STI's Monitoring division.

**Anthony Hershberger**, STI Director of Financial Analysis/New Venture Analysis. Mr. Hershberger is responsible for the Financial Engineering team, which develops and models financial offerings for facility customer contracts.

**Jacob Katz**, JPay Senior Manager, Product Management. Mr. Katz directs the development of JPay's product lines.

**Michael Kester**, STI Senior Director, Public Safety Operations, since 2017. Mr. Kester is responsible for the management of STI's Public Safety division (including product development and operations).

**Greg Levine**, JPay Executive Vice President, Sales

**Robert Pickens**, STI President through 2017, and Chief Executive Officer and President since January 2018

**Russell Roberts**, STI Vice President, Marketing & Strategy through 2017, and Senior Vice President, Sales and Marketing since January 2018

**Jonathan Secrest**, STI Vice President and Managing Director, EMS. Mr. Secrest is responsible for the management of STI's Monitoring division (including product development and operations).

**Ryan Shapiro**, JPay Chief Executive Officer until September 16, 2016.

**Mark Silverman**, JPay Chief Financial Officer until March 4, 2016, and the CFO position remains unfilled since Mr. Silverman left the company.

**Sanjay Singhvi**, Archonix Managing Director, 2013-2017. Mr. Singhvi was responsible for the overall management of Archonix, development of business and product lines, and execution of contracts.

**Matthew Smith**, STI Director, Product Management. Mr. Smith directs the development of STI's product lines, brand management, and field marketing operations.

**Jade Trombetta**, JPay Senior Manager, Brand Marketing and Social Media. Ms. Trombetta directs brand management, out-facing messaging, and social media channels.

**Greg Utterback**, STOP Chief Development Officer. Mr. Utterback is responsible for sales and product development for STI's Monitoring division.

**Dan Wigger**, STI Vice President and Managing Director, Wireless Containment. Mr. Wigger is responsible for the management of STI's WCS division (including product development and operations).

- b. a list of persons responsible for negotiating the Transaction, analyzing the Transaction, recommending the Transaction be approved; approving the Transaction, and integration planning, and a brief description of role and responsibility.*

**Response to Specification 1(b):**

(1) Persons Responsible for Negotiating the Transaction

Richard Smith, Former CEO/Advisor to the Board, STI  
Dennis Reinhold, SVP and General Counsel, STI  
Matt Louie, Principal, Platinum Equity

(2) Persons Responsible for Analyzing the Transaction

Geoffrey Boyd, CFO, STI  
Matt Louie, Principal, Platinum Equity

(3) Persons Responsible for Recommending that the Transaction be Approved

Platinum Equity Board of Directors  
Robert Pickens, CEO and President, STI

(4) Persons Responsible for Approving the Transaction

Platinum Equity Board of Directors

(5) Persons Responsible for Integration Planning and Implementation

Robert Pickens, CEO & President, STI  
David Kunde, SVP Network Operations and Platform Development, STI  
Robert Russell, SVP Sales and Marketing, STI

Larry Ehlers, VP, Applications, STI  
Kate Lengyel, VP, Human Resources, STI

2. ***Provide one copy of each document each Applicant submitted in response to Items 4(c) and 4(d) of the Notification and Report Form filed consistent with the Hart-Scott-Rodino Antitrust Improvements Act of 1976 and section 803.1(a) of the premerger notification rules, 16 CFR Parts 801-803.***

**Response to Specification 2:** The HSR 4(c) and 4(d) documents are provided in the Supplemental Production at Bates range STI-PLT-00000001-STI-PLT-00000086.

3. ***List each Relevant Service sold by each of the Applicants, and for each Relevant Service describe separately for each Applicant any identifying information such as brand name and end-users or user group (e.g., inmates, correctional staff). Identify, describe and provide all documents related to how the Transaction will affect the combined company's plans and offerings for each Relevant Service, including any steps the combined company will take post-Transaction to change existing service offers and/or terms and conditions to Facility Customers.***

**Response to Specification 3:** Documents responsive to Specification 3 are in the Document Production. Securus provides the table below listing and describing each Relevant Service.

<b>Relevant Service</b>	<b>Business Unit</b>	<b>Description</b>
NextGen Secure Communications Platform ("NextGen SCP")	Corrections Solutions	NextGen SCP is a single platform for managing, researching, monitoring, investigating, and exploring information through STI products and services. NextGen SCP is provided to facility users within the corrections and investigative domains and brings increased security, unparalleled control over inmate communications, and real time alerts.
Securus Online	Corrections Solutions	Securus Online gives family & friends the ability to manage all of their STI accounts within a single, mobile-enabled account management portal.
Securus Video Visitation	Correction Solutions	Securus Video Visitation automates the inmate visitation process and offers multi-session live monitoring, visitation rules, approved and blocked inmate lists, multiple payment options & promotions, and advanced scheduling.
Electronic Monitoring (VeriTracks)	Monitoring Solutions	VeriTracks is STI's secure web-based monitoring application that receives, stores, and distributes monitoring data from GPS and alcohol monitoring devices. Customers of this product include facilities, probation and parole officers, and courts.
Secure Call Platform ("SCP")	Corrections Solutions	SCP is the most widely used, flexible, and dynamic call control platform in corrections including feature such as Covert Alert, Crime Tip, and Call Monitoring
ConnectUs	Corrections Solutions	ConnectUs is the inmate's portal to all STI products and services and allows for the delivery of services such as telephone calls and video visitation sessions and applications

<b>Relevant Service</b>	<b>Business Unit</b>	<b>Description</b>
		such as grievance forms, eMessaging, educational videos, law library, and account management settings.
SecureView Tablet	Corrections Solutions	SecureView Tablet provides access to educational, self-help, mental health, religious, employment, and legal research tools to help inmates cope with incarceration or prepare for reentry. In addition, inmates can access media and communication services.
THREADS	Investigative Solutions	Software used by facilities, investigators, and district attorneys, analyzes data such as inmate calls, public phone records, inmate video visits, cell tower dumps, data from confiscated cell phones, and called party data to generate targeted investigative leads.
Inmate Intercommunication Evaluation and Reporting (“ICER”)	Investigative Solutions	The ICER system is used by facilities and investigators to detect inmate-to-inmate communications and alert authorized facility staff to help them control and stop crimes committed by inmates.
GPS Monitoring (“BLUtag” and/or “BLU+”)	Monitoring Solutions	One-piece GPS monitoring device that attaches to users’ ankle.
Alcohol Monitoring (“BLUband”)	Monitoring Solutions	Handheld, wireless, portable breath alcohol device with facial verification.
Securus Lobby Kiosk	Corrections Solutions	A lobby kiosk solution that enables family and friends to fund phone accounts and make a deposit into the inmate’s commissary trust account.
Investigator Pro (“iPRO”)	Investigative Solutions	iPRO gives investigators tools to monitor inmates who try to hide their identities and commit crimes using the telephone system. iPRO uses voice biometric technology to identify inmates on calls by name. It includes data analysis and call database search features that let investigators identify the calls most likely to reveal illicit activity.
National Cellular Forensics	Investigative Solutions	National Cellular Forensics enables agencies to access mobile phone device data.
ConnectUS Applications	Corrections Solutions	ConnectUS Applications provide key communication services such as phone calls and video visitation as well as apps to automate manual processes such as inmate forms and access to legal information.
Wireless Containment Solutions	Corrections Solutions	Wireless Containment Solution is a service which offers a private prison cell phone network capable of managing all cellular telephone communications. The system allows authorized phones to communicate and denies unauthorized (contraband) cell phones access to commercial networks so that they cannot communicate.
Automated Information Services (“ATS”)	Corrections Solutions	AIS is an Interactive Voice Response (IVR) system that automatically provides inmate-specific and general facility information to detainees and outside callers over the phone.



<b>Relevant Service</b>	<b>Business Unit</b>	<b>Description</b>
RF Monitoring (“BLUband”)	Monitoring Solutions	BLUband provides traditional RF/house arrest monitoring, which is paired with BLUhome, Securus’ home-based receiver. BLUband transmits an encrypted RF signal to BLUhome, which records and transmits the date and time when the user enters and leaves his/her house.
Securus Video Relay Service	Corrections Solutions	Securus VRS allows deaf and hard-of-hearing inmates to communicate using video technology with is fully integrated into STI’s Secure Call Platform (SCP) ensuring critical call controls are maintained.
Investigative Call Monitoring	Investigative Solutions	This product provides facilities and investigators with inmate communication monitoring for illicit inmate activity.
Computer Aided Dispatch (“XCAD”)	Public Safety Solutions	XCAD is a comprehensive Computer Aided Dispatch system designed to support police and law enforcement agencies and their responses to 911 calls.
Electronic Medical Records (“Uniek EMR”)	Corrections Solutions	Uniek EMR is a HIPAA compliant, secure web-based software developed to provide a comprehensive EMR solution to facilities and medical staff.
Jail Management System (“XJAIL”)	Corrections Solutions	XJAIL is an inmate-centric software application designed for the management needs of correctional facilities.
Records Management System (“XRMS”)	Public Safety Solutions	XRMS is a records management system offering utilized by law enforcement agencies and sheriff departments to, for example, collect, maintain, and retrieve data related to incident reports, arrests, in custody property management, warrants, alarm permits/billing, licenses/permits, Master Name Information, locations, and vehicles.
JPAY Money Transfer	Corrections Solutions	JPAY’s Money Transfer service provides a safe mechanism for family and friends to send money to inmates.
AdvanceConnect	Corrections Solutions	AdvanceConnect allows inmate family members and friends to pre-pay for calls originating from inmates in correctional facilities.
Inmate Debit	Corrections Solutions	Inmate Debit is an inmate-owned prepaid calling account with funding and refunding options giving inmates the ability to pay for their own calls.
eMessaging	Corrections Solutions	eMessaging is a two-way messaging service for family and friends of inmates to initiate conversations with the inmates. Facilities have the ability to review messages and photos transmitted using this service for policy violations and investigative purposes.
Instant Pay	Corrections Solutions	Instant Pay is a promotional program that allows calls to connect inmates to family and friends when they do not have a sufficient billing relationship with Securus.
Prepaid Calling Cards (“PPCC”)	Corrections Solutions	PPCC are inmate-owned and are used to pay for telephone calls. Cards are purchased by inmates through the facility or approved commissary vendors. Inmate family and friends can

Relevant Service	Business Unit	Description
		also purchase PPCCs through the facility or designated vending machines.
Outbound Voicemail	Corrections Solutions	Outbound Voicemail allows inmates to leave voicemail messages in the event their call goes unanswered.

4. *Describe the inmate telecommunications services provided by each of the Applicants and whether the services are facilities-based or resold services. If resold, identify the underlying facilities-based carrier or carriers.*

**Response to Specification 4:** STI provides Internet Protocol-enabled inmate calling services relying on facilities provided by third-party internet providers, such as Level 3 Communications. A diagram depicting a typical call using session-initiated IP to send inmate initiated communications services through the entire course of the call are in the Supplemental Production at Bates range STI-GC-00000824.

5. *List and describe each contract that each Applicant has with a Facility Customer to provide a Relevant Service. State the date at which the contract went into effect, contract renewal or extension dates, terms of renewals or extensions that have gone into effect, and terms for future renewals or extensions.*

**Response to Specification 5:** A report based on information that STI retains in the ordinary course of its business is in the Supplemental Production at Bates number STI-SALES-00000823.

6. *For each Facility Customer, state separately for each Applicant and for each of the last five years and separately for each facility operated by the Facility Customer and for each contract between an Applicant and the Facility Customer:*
- the address of each facility;*
  - total average daily populations (ADP) of inmates;*
  - total quantities of each Relevant Service, including the number of phone calls and number of phone minutes purchased by inmates in the custody of the facility;*
  - total revenues earned from inmates in the custody of the Facility Customer broken down by each Relevant Service and type of fee or charge as applicable;*
  - total revenues earned from the Facility Customer, broken down separately by each Relevant Service;*
  - total revenues earned from parties communicating with inmates in the custody of the Facility Customer broken down by each Relevant Service and type of fee or charge as applicable;*
  - total commissions paid to the Facility Customer broken down separately by each Relevant Service and the type of payment as applicable;*
  - total other expenditures by each Applicant relating to the provision of any Relevant Services to the Facility Customer or the inmates in the custody of the Facility Customer broken down by (A) the total expenditures related to the*

*provision of each Relevant Service or component thereof, and (B) the type of expenditure as applicable including without limitation:*

- 1. upfront costs incurred by each Applicant at the start of the contract term (e.g., cost of new or replacement equipment; equipment installation cost; cost of customizing or installing software; labor costs; wiring cost; cost of arrangements with local telephone companies or internet service providers; cost of obtaining or expanding call or data processing facilities or storage server capacity; etc.); and*
- 2. ongoing costs incurred by each Applicant during the contract term; and*
- i. whether each Applicant provides any dedicated or local personnel to serve the facilities operated by the Facility Customer, and if so, state separately for the Applicant:*
  - 1. the number of personnel, their titles, and the number of facilities;*
  - 2. whether the personnel are dedicated to the facility;*
  - 3. whether the personnel are local on site or off-site; and*
  - 4. total cost to each Applicant of providing the personnel.*

**Response to Specification 6:** A response to this Specification is being prepared in connection with a similar specification in the DOJ Second Request. STI will supplement its response to this Specification as soon as this is completed.

- 7. For each Relevant Service, identify, describe and provide documents sufficient to show the extent to which each Applicant has altered its pricing strategies since January 1, 2013 as to actual or potential Facility Customers and as to inmates.*

**Response to Specification 7:** Documents responsive to this Specification are contained in the Document Production.

- 8. Describe and provide all documents relating to any allegation that either Applicant, its employees, or any of its current or potential competitors have behaved or are behaving in an anticompetitive manner or a manner that is alleged to violate any provision of the Communications Act of 1934, as amended, or any Federal Communications Commission rule or order, including but not limited to allegations by any calling or called party, inmate, Facility Customer, and competitor complaints; threatened, pending, or completed lawsuits; or federal or state investigations, excluding any investigations by the Federal Communications Commission.*

**Response to Specification 8:** Documents responsive to this Specification are in the Document Production.

- 9. List the names of each of the Applicants' competitors for the provision of any Relevant Service in the last five years, and for each such competitor, submit all documents relating*

*to that competitor's efforts to compete in the provision of each Relevant Service, including:*

- a. facilities to be served;*
- b. products or services to be supplied, including features or quality, and new services;*
- c. pricing, including inmate prices and commissions, and including discounts or rebates;*
- d. sales;*
- e. requests for proposals (RFPs) or bids;*
- f. sales call reports or win/loss reports;*
- g. features or quality;*
- h. offering additional products and services to purchasers of any Relevant Service;*
- i. expansion plans;*
- j. research and development;*
- k. plans to introduce a new Relevant Service;*
- l. plans to exit (or actual exit of) the provision of any Relevant Service;*
- m. market shares; and*
- n. relative strengths and weaknesses.*

**Response to Specification 9:** A response to this Specification is being prepared in connection with a similar specification in the DOJ Second Request. Documents responsive to this Specification are in the Document Production.

- 10.** *For each competitor listed in response to Information Request 9, identify and provide documents sufficient to show any relationship between either Applicant and such competitor, including without limitation (a) identifying whether and to what extent each Applicant owns, controls, or is an affiliate of that competitor or any direct or indirect parent thereof and (b) providing any agreements between either of the Applicants and such competitor. Identify and provide documents sufficient to show any relationship between either of the Applicants and CenturyLink, including without limitation providing any agreements between either of the Applicants and CenturyLink.*

**Response to Specification 10:** STI is not an owner, controller, or affiliate of any ITS competitor. Documents pertaining to CenturyLink may be found in the Supplemental Production at Bates range STI-GC-0000087-STI-GC-00000673 and in the Document Production.

- 11.** *List the names of each person that has plans to enter or expand output of, has entered or expanded output of, or has attempted to enter or expand output of the provision of any Relevant Service in the last five years, and for each such plan, entry, expansion, or attempt:*
- a. describe the plan, entry, or attempt, including identifying the Relevant Service; and*

- b. *describe the Applicants' estimate of costs and times to enter, steps necessary to entry, and entry barriers (including any necessary regulatory approvals and the minimum viable scale required for entry).*

**Response to Specification 11:** A response to this Specification is being prepared in connection with a similar specification in the DOJ Second Request. STI will supplement its response to this Specification as soon as this is completed.

12. *Applicants assert that "there are no obstacles (technological, IP-related, reputational, cost) preventing [competitors] from quickly scaling to bid and win opportunities of every size." (Joint Opposition to Petition to Deny at 19). Applicants further assert that "there are no barriers (either with respect to STI or ICS) that would make it more difficult for various competitors of ICS from bidding successfully for ICS opportunities." (Consolidated Joint Reply Comments at 6). Identify and provide all documents that support or refute the statements. Identify and describe in detail and provide all documents related to whether the location of an actual or potential Facility Customer may represent an obstacle to the provision of service by a competitor (e.g., rural or remote location).*

**Response to Specification 12:** STI is not aware of any specific documents responsive to the final sentence of this Specification. Documents otherwise responsive to this Specification are in the Document Production.

13. *Applicants assert that "historical market shares of the parties in a contestable bidding market are not a relevant predictor of future competitive outcomes." (Joint Opposition to Petition to Deny at 17). Identify, describe, and provide documents sufficient to show the analytic factors each Applicant uses to measure its own ability, and the ability of competitors, to compete for customers for the provision of Relevant Services.*

**Response to Specification 13:** Documents responsive to this Specification are in the Document Production

14. *Applicants state that "[t]oday, many incumbent competitors besides GTL and STI can - and do-provide ITS to larger correctional facilitates, including CenturyLink (which is an independent competitor)." Applicants further state that "CenturyLink's presence in fact does constrain the prices charged by all other bidders." (Joint Opposition to Petition to Deny at 16, 21). Identify all "incumbent competitors" to which this statement is referring and identify and provide documents sufficient to show that each such entity "provide[s] ITS to larger correctional facilitates." Provide all documents relating to, discussing, or analyzing CenturyLink, or any other "incumbent competitor" identified in response to this request, as a competitor to the Applicants post-transaction, including any documents relating to whether the incumbent competitor's presence constrains the prices charged by other bidders.*

**Response to Specification 14:** STI identifies the following incumbent competitors: Amtel Inc., CenturyLink, CityTel Coin, Combined Public Communications, Consolidated Telecom,

Correct Solution Group, Global Tel\*Link, Infinity Networks, Lattice, Legacy, NCIC, Pay Tel Communications, Prodigy, Reliance, Synergy Telecom and Talton. Documents responsive to this Specification are in the Document Production.

15. *Provide all documents relating to, and describing the reasons for, the Transaction and the costs to complete it; all plans and the rationales for any change in the Applicants' business as a result of the Transaction and the costs to achieve them; and all risks associated with the Transaction.*

**Response to Specification 15:** Documents responsive to this Specification are in the Document Production.

16. *Provide a detailed explanation and identify and provide documents sufficient to show the basis for and derivation of the Applicants' claimed public interest benefits, efficiencies, and synergies resulting from the proposed Transaction (as set forth in the Public Interest Statement at 3-5 of the Application and Joint Opposition to Petition to Deny at 27-28), and for each explanation provide:*

- a. *a summary and provide and identify documents sufficient to show the underlying assumptions and steps the Applicants will take to achieve the claimed cost savings, efficiencies, synergies, and other benefits; the costs Applicants will incur to achieve these effects; the risks the Applicants face in realizing these effects; the breakdown between savings in fixed costs and marginal costs; and the time required to achieve these effects (including whether they are primarily short-term or long-term);*
- b. *a summary and provide and identify all documents related to efforts by either Applicant to achieve similar benefits, efficiencies, and synergies without the Transaction; barriers posed to either Applicant achieving similar benefits, efficiencies, and synergies without the Transaction; and reasons the Transaction will enable the claimed benefits, efficiencies, and synergies;*
- c. *the Applicants' plans to pass through any cost savings from the Transaction, including but not limited to inmates, and the extent to which each of the Applicants have passed through past cost savings, including to inmates and their families, from prior transactions (including the magnitude and time horizon for these pass-through cost savings to inmates); and*
- d. *a description of the additional products and services the combined company will be able to offer each existing ICSolutions' Facility Customer because of the Transaction that are currently not offered by ICSolutions. Describe any products and services that Securus will cease offering to each existing ICSolutions Facility Customer as a result of the Transaction.*

**Response to Specification 16:** A response to this Specification is being prepared in connection with a similar specification in the DOJ Second Request. STI will supplement its

response to this Specification as soon as this is completed. Documents responsive to Specifications 16(a)-(c) are in the Document Production.

**Response To Specification 16(d):** STI does not intend to cease offering any products and services currently being offered to existing ICSolutions Facility Customers under extant contracts as a result of the Transaction. Those services will continue to be provided in accordance with the terms of those contracts.

The combined company expects to be able to offer the following services to ICS Solutions Facility Customers that are not currently offered by ICSolutions: (a) outbound voicemail, (b) investigative services that include call monitoring and reporting, (c) contraband cellphone detection services (d) reports on inmate-to-inmate communications and (e) access to potential job opportunities on release (Jobview)

**17. *Provide full and complete copies of the Unit Purchase Agreement by and among ICS, TKC, Keefe, and Securus, merger or acquisition agreement (and all amendments and attachments thereto), and any side or letter agreements or other related agreements (and all amendments and attachments thereto) that Applicants have entered into that relate to the Transaction.***

**Response to Specification 17:** A copy of the Unit Purchase Agreement with Exhibits and Disclosure Schedules is in the Supplemental Production at Bates range STI-GC-00000674-STI-GC-00000822.

**18. *Describe the timetable for the Transaction, and identify, provide and describe documents sufficient to show:***

- a. *all actions that must be taken before its completion, including each domestic regulatory, competition, or antitrust authority that the Applicants have notified (or intend to notify) of the Transaction, and the case numbers as assigned by each entity;***
- b. *the timing for each such action, including for each authority notified, the dates (or expected dates) the authority was (or is expected to be) notified and did or will complete its review;***
- c. *any harm that would result if the Transaction is delayed or not completed; and***
- d. *any terms or conditions of the Transaction that are not reflected in the merger or sale agreement.***

**Response to Specification 18:** A response to this Specification is being prepared in connection with a similar specification in the DOJ Second Request. STI will supplement its response to this Specification as soon as this is completed. Documents responsive to this Specification are in the Document Production.

**19. *Describe each bid, estimate, quote, proposal, or response to any request for information, submission, or proposal (collectively hereinafter, bid) that each of the Applicants drafted, submitted, or participated in as a primary bidder, joint bidder, or subcontractor since***

*January 1, 2013 to supply any Relevant Service, and for each bid list the following in the format specified in the accompanying template:*


- a. issuer and date of the Request for Proposal (RFP);*
- b. date each Applicant submitted the bid;*
- c. if either Applicant ultimately withdrew a bid, state the withdrawal date and the reason for withdrawal;*
- d. the identity of the incumbent provider at the time of the RFP, or state if there was no incumbent provider;*
- e. the total estimated value, in dollars, of the bid, including any recurring or one-time commissions to the actual or potential Facility Customer, or other incentives;*
- f. the initial duration of the contract as described in the RFP, including starting and ending dates;*
- g. the name and address(es) of the Facility Customer covered in the contract, and the address and type of each facility to be served (e.g., jail or prison);*
- h. the average daily number of inmates at all facility address(es) covered by the contract;*
- i. the contract's provisions for possible extensions;*
- j. whether the bid submitted won or was declined, and if won, the estimated value of the bid;*
- k. each Relevant Service provided in the winning bid;*
- l. if an Applicant did not win the bid, the name, if known, of the winning bidder, the ranking of the Applicant or Applicants' bid or bids; and reason for not winning, if known;*
- m. the identities of all other bidders and the ranking of their bids, if known; and*
- n. for each bid described, provide all documents related to the RFP, the completed bid, and all correspondence between the actual and potential Facility Customer and either of the Applicants; and identify in metadata associated with each document to which RFP each document refers.*

**Response to Specification 19:** STI will provide an RFP Drive including relevant RFP information. This is expected to be produced to the DOJ as part of the DOJ Production on or about October 1, 2018. As noted above, STI will provide the RFP Drive portion of the Document Production when it becomes available.



Respectfully submitted,

**SECURUS TECHNOLOGIES, INC.**

By: 

Paul C. Besozzi

Peter M. Bean

Squire Patton Boggs (US) LLP

2550 M Street, N.W.

Washington, DC 20037

202-457-6000 (tel)

202-457-6315 (fax)

paul.besozzi@squirepb.cpm

peter.bean@squirepb.com

*Counsel for Securus Technologies, Inc.*

Dated: September 25, 2018

**DECLARATION OF DENNIS J. REINHOLD**

I, Dennis J. Reinhold, hereby declare under penalty of perjury as follows:

1. I am the Senior Vice President and General Counsel of Securus Technologies, Inc.;
2. I have read the attached Responses of Securus Technologies, Inc. to the Federal Communications Commission's Information and Document Requests ("Responses"), which were prepared pursuant to my direction and control;
3. This Declaration is submitted in support of the foregoing Responses; and
4. The allegations of fact contained in the Responses are true and correct to the best of my knowledge and belief.

Dated: September 25, 2018

  
Dennis J. Reinhold



**SECURUS**  
TECHNOLOGIES

## SCP Centralized System – Path of Inmate Call

